

- WILL GRANNIS -

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

----- X  
ULKU ROWE,

Plaintiff,

Case No.  
19 Civ. 08655 (LGS) (GWG)

v.

GOOGLE LLC

Defendant.

----- X

DATE: October 29, 2020

TIME: 11:33 A.M.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION

OF WILL GRANNIS, held via Zoom, pursuant to  
Notice, before Hope Menaker, a Shorthand Reporter  
and Notary Public of the State of New York.

<p style="text-align: right;">Page 30</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 did not report to me I was also someone that she</p> <p>2 would come to for advice.</p> <p>3 Q. And how frequently as the direct</p> <p>4 manager did you have one-to-ones with her?</p> <p>5 A. The -- the normal schedule was every</p> <p>6 two weeks unless it was interrupted by some type</p> <p>7 of vacation, time off, other circumstances; but</p> <p>8 it's all of my direct reports and I, we have a</p> <p>9 one-to-one on a standing schedule.</p> <p>10 At -- at the beginning it was every</p> <p>11 week, then it went to every two weeks and then</p> <p>12 over time I found that many of my direct reports</p> <p>13 choose to go once a month, but generally speaking</p> <p>14 it was very frequent.</p> <p>15 Q. And were there times that you</p> <p>16 interacted outside of your normally scheduled</p> <p>17 one-to-ones?</p> <p>18 A. Yes.</p> <p>19 Q. And what would be the types of</p> <p>20 circumstances where you would interact outside of</p> <p>21 one-to-ones?</p> <p>22 A. As I recall, most of those</p> <p>23 interactions were initiated by Ulku asking me a</p> <p>24 question on a specific circumstance.</p> <p>25</p>	<p style="text-align: right;">Page 32</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 detail, so it will probably help. OCTO, the job</p> <p>2 family as seen in the job description and in OCTO</p> <p>3 as we've described since the very beginning of the</p> <p>4 CTO office, the role consists of three main we'll</p> <p>5 call them buckets of work. There's customer work,</p> <p>6 there's influencing the platform and products, and</p> <p>7 then there is the speaking, the evangelism part.</p> <p>8 In order to create impact with the</p> <p>9 customer OCTOs are expected to help materially</p> <p>10 advance the progress of the largest brands in the</p> <p>11 world; and what I mean by that is, you know, come</p> <p>12 to Cloud, come to Google Cloud and succeed with</p> <p>13 Google Cloud.</p> <p>14 The second pillar, the engineering</p> <p>15 pillars, are expected to take their knowledge from</p> <p>16 the corporate world and what they obtain at Google</p> <p>17 and they're expected to show impact on the product</p> <p>18 road map, and this can come in a variety of</p> <p>19 fashions. Most often this means that they have</p> <p>20 championed a change that we need make to what</p> <p>21 we're building that it is accepted by the</p> <p>22 engineering, production, leadership.</p> <p>23 And the third pillar is conveying the</p> <p>24 power of our technology to the outside world</p> <p>25</p>
<p style="text-align: right;">Page 31</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. And in your interactions with her,</p> <p>2 have you found her to be professional?</p> <p>3 A. Yes.</p> <p>4 Q. Have you found her to be</p> <p>5 knowledgeable with respect to her subject area?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. As documented in performance reviews,</p> <p>8 there are three categories. You know, when you</p> <p>9 say "knowledgeable," that requires a view across</p> <p>10 the three categories of the role. There's a</p> <p>11 customer element of the role, there's an</p> <p>12 engineering element of the role, and there's an</p> <p>13 evangelism element of the role.</p> <p>14 Ulku has demonstrated as -- you know,</p> <p>15 as shown in her performance reviews she's</p> <p>16 demonstrated acumen and knowledge; significant</p> <p>17 knowledge in evangelism, knowledge of financial</p> <p>18 services and customers, but impact knowledge on</p> <p>19 the engineering pillar has been less than the</p> <p>20 average in OCTO.</p> <p>21 Q. And tell me what that means, "impact</p> <p>22 knowledge."</p> <p>23 A. What that means is the sec -- the --</p> <p>24 if I may describe the three in a little more</p> <p>25</p>	<p style="text-align: right;">Page 33</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 and helping create a translation between our</p> <p>2 technology and its possibilities in the context of</p> <p>3 the day; and in this way Ulku for example spent</p> <p>4 most of her time explaining the power of</p> <p>5 technology to financial services organizations and</p> <p>6 regulators, organizations like that externally.</p> <p>7 Q. So we'll come back to some of this.</p> <p>8 With respect to the second bucket,</p> <p>9 influencing the platform products and the</p> <p>10 engineering piece -- do I have that right, that's</p> <p>11 the second bucket?</p> <p>12 A. Yes.</p> <p>13 Q. Describe for me a little bit more</p> <p>14 about the engineering aspect of -- of the role,</p> <p>15 what it means to impact -- have an impact on the</p> <p>16 product road map.</p> <p>17 A. Examples of impact can range from</p> <p>18 conceiving of a design of a new product and</p> <p>19 ensuring that it's built. It can be spotting an</p> <p>20 opportunity to evolve something that we already</p> <p>21 have and make it better.</p> <p>22 And it -- I think it's critical to</p> <p>23 point out that the idea itself is only a little</p> <p>24 bit of the role, that the -- the full as, you</p> <p>25</p>

<p style="text-align: right;">Page 182</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. Do you recall whether there were</p> <p>2 people who you believed did not exceed</p> <p>3 expectations, was the next category meets</p> <p>4 expectations?</p> <p>5 A. Yeah, on a scale --</p> <p>6 MR. GAGE: Objection.</p> <p>7 Go ahead. Sorry.</p> <p>8 A. On a scale of 5, 5 being superb which</p> <p>9 is the top performance in the -- in the job role</p> <p>10 level, 4 being strongly exceeds, 3 being exceeds,</p> <p>11 2 being meets, and 1 being needs improvement,</p> <p>12 OCTOs over the last four and five years have</p> <p>13 earned scores ranging from these improvements in</p> <p>14 being exited out of the company to -- OCTOs over</p> <p>15 the last four or five years have received a range</p> <p>16 of ratings spanning from needs improvement which</p> <p>17 is a 1 out of 5, to a superb which is 5 out of 5.</p> <p>18 And in this period of time I'm</p> <p>19 confident, though I don't have the data in front</p> <p>20 of me, that OCTOs achieved range of scores on that</p> <p>21 spectrum.</p> <p>22 Q. Did a majority fall within a certain</p> <p>23 category of the people you evaluated --</p> <p>24 A. I'd have to.</p> <p>25</p>	<p style="text-align: right;">Page 184</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 performed well in the one-to-one and one-to-many,</p> <p>2 but did not perform well in engineering which is</p> <p>3 why her rating was not higher.</p> <p>4 Q. Did she do anything on that pillar?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. I'd have to --</p> <p>7 MR. GAGE: In this particular year or</p> <p>8 ever?</p> <p>9 MS. GREENE: Ever.</p> <p>10 A. Very little. Consistently if you</p> <p>11 look over the span of her performance years,</p> <p>12 you'll notice a very consistent pattern and that</p> <p>13 is a lack of meaningful impact in engineering.</p> <p>14 In her late -- latest performance</p> <p>15 review which we just actually had this week it was</p> <p>16 pointed out that she has started some efforts that</p> <p>17 might be promising, but we don't grade on intent,</p> <p>18 we grade on impact and Ulku has yet to demonstrate</p> <p>19 any significant impact in the engineering pillar.</p> <p>20 Q. And what -- you mentioned in this</p> <p>21 year's review, what -- what review did you give in</p> <p>22 this last have evaluation, what scores?</p> <p>23 A. I think exceeds expectations. An</p> <p>24 OCTO is limited in their ability to score high</p> <p>25</p>
<p style="text-align: right;">Page 183</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. -- or did the people you evaluated</p> <p>2 fall within a certain category?</p> <p>3 A. I'd have to look at the --</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. I'd have to look at the data to give</p> <p>6 you a definitive answer.</p> <p>7 Q. Was a 5 a regular occurrence or would</p> <p>8 that be more unusual for someone to be 4 to 5?</p> <p>9 A. Statistically the least likely</p> <p>10 ratings are the poles, as you would expect</p> <p>11 the -- the extremes, the needs improvement, and</p> <p>12 the superbs.</p> <p>13 Q. Did Google apply any sort of Bell</p> <p>14 Curve to -- or fourth-ranking process to its</p> <p>15 evaluation rankings?</p> <p>16 A. No, people were allowed to earn the</p> <p>17 score that they earned.</p> <p>18 Q. With respect to Ms. Rowe's</p> <p>19 performance evaluation that you completed, were</p> <p>20 you accurate or did you strive to be accurate in</p> <p>21 terms of the feedback and assessment that you</p> <p>22 provided in those reviews?</p> <p>23 A. Yes, it's absolutely critical for the</p> <p>24 functioning of the team; and as an example Ulku</p> <p>25</p>	<p style="text-align: right;">Page 185</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 on -- on the rating if they're not fulfilling one</p> <p>2 of the pillars on the job.</p> <p>3 Q. Give me just a moment.</p> <p>4 Okay. After Ms. Rowe joined Google,</p> <p>5 did she raise concerns with you about her level?</p> <p>6 A. The time when I remembered most</p> <p>7 specifically was in the transition to the vertical</p> <p>8 organization, when she was asking about the</p> <p>9 correspondence that we -- that we talked about</p> <p>10 earlier.</p> <p>11 Q. Are you aware that in the fall of</p> <p>12 2018, she raised with Kevin Lucas and Melissa</p> <p>13 Lawrence concerns about her levelling and that men</p> <p>14 had been leveled higher than her?</p> <p>15 MR. GAGE: Objection.</p> <p>16 A. I'm -- I'm not aware of the timing or</p> <p>17 the nature of the concerns, but I am aware because</p> <p>18 I had a discussion with employee relations that</p> <p>19 there was a general concern.</p> <p>20 Q. When was that discussion with</p> <p>21 employee relations?</p> <p>22 A. I don't remember off the top of my</p> <p>23 head.</p> <p>24 Q. Was it after she was back in OCTO or</p> <p>25</p>

<p style="text-align: right;">Page 190</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 know both Ulku and Tariq reached out to me about</p> <p>2 whether there was a position in OCTO available if</p> <p>3 she wanted to come back.</p> <p>4 Q. What do you recall with respect to</p> <p>5 the conversation with Mr. Shaukat?</p> <p>6 A. Just that if there was still a role</p> <p>7 in OCTO for Ulku if she wanted to focus more on</p> <p>8 engineering, because his org was focused on</p> <p>9 verticals and industries, and if she was</p> <p>10 interested in spending more of her time on the</p> <p>11 engineering side, technology side if there was a</p> <p>12 role available and I -- I immediately answered</p> <p>13 yes.</p> <p>14 Q. Did he express anything with respect</p> <p>15 to why he was asking the question?</p> <p>16 A. No, he just asked me the question.</p> <p>17 Q. Did you ask him why it was being</p> <p>18 considered?</p> <p>19 A. No. I just knew that if Ulku had</p> <p>20 proven herself in the customer and the evangelism</p> <p>21 side of our -- of our team, if she was interested</p> <p>22 in attacking that -- that center bucket of</p> <p>23 engineering and she was committing herself to</p> <p>24 that, that there would be a place for her in OCTO.</p> <p>25</p>	<p style="text-align: right;">Page 192</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 on an area that was important horizontally to the</p> <p>2 platform and not to financial services, because</p> <p>3 they were the -- Tariq's org was the organization</p> <p>4 focused on financial services, hence the reason</p> <p>5 for the reorg in the first place.</p> <p>6 And I offered Ulku a choice of an</p> <p>7 area to focus on and we determined that Hybrid</p> <p>8 Cloud had enough investment potential behind it</p> <p>9 from an engineering perspective and that her work</p> <p>10 at a bank might line up well with knowledge of how</p> <p>11 to implement hybrid architectures.</p> <p>12 Q. Do you know who took over her -- what</p> <p>13 she had been doing with respect to the financial</p> <p>14 services industry?</p> <p>15 A. In Tariq's organization?</p> <p>16 Q. In Tariq's organization and just</p> <p>17 generally in the organization?</p> <p>18 A. Well, I can --</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. I can only speak to OCTO directly.</p> <p>21 When we made the reorg and moved the vertical</p> <p>22 leaving OCTOs out of OCTO, we no longer focused on</p> <p>23 and looked at financial services or manufacturing</p> <p>24 as a primary designation for the team which is</p> <p>25</p>
<p style="text-align: right;">Page 191</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. Do you know whether the decision to</p> <p>2 move her -- or I'm sorry.</p> <p>3 Do you know whether the conversation</p> <p>4 you had with Mr. Shaukat came after it was</p> <p>5 communicated to her that she would not be getting</p> <p>6 the -- the financial services lead role?</p> <p>7 A. I -- I don't know the timing of that</p> <p>8 commun -- I don't know the exact timing of the</p> <p>9 communications, but I would assume she wouldn't be</p> <p>10 looking for a role if she had a different role</p> <p>11 that she wanted.</p> <p>12 Q. Was this in early 2019?</p> <p>13 A. Generally that sounds correct because</p> <p>14 I think she's been in OCTO now a little over a</p> <p>15 year, year and a half and that timeline would</p> <p>16 match up because it didn't -- we didn't take too</p> <p>17 long to bring her back.</p> <p>18 Q. And once she moved back, what was the</p> <p>19 discussion with respect to what her role would be</p> <p>20 vis-à-vis financial services?</p> <p>21 A. That it wouldn't be in financial</p> <p>22 services and that was pretty clear. Tariq -- the</p> <p>23 conversation he and I had about it was to focus on</p> <p>24 technology, to focus on engineering, and to focus</p> <p>25</p>	<p style="text-align: right;">Page 193</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 why we never constituted backup, a -- you know,</p> <p>2 a group focused specifically on verticals or</p> <p>3 industries, why we are aligned and organized by</p> <p>4 engineering-focus areas.</p> <p>5 Q. Understood, and I'm just asking you</p> <p>6 if you happen to know whether anyone in Google has</p> <p>7 become and is the go-to person with respect to</p> <p>8 financial services customers?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. I don't -- you know, the go-to person</p> <p>11 from my perspective at the time when I labeled</p> <p>12 Ulku the go-to person, we were a much a smaller</p> <p>13 organization as well. We've grown significantly</p> <p>14 since then and we've hired a wide variety of</p> <p>15 people from the financial services industry who</p> <p>16 also possess very deep engineering expertise.</p> <p>17 For example Royal Hansen who's VP of</p> <p>18 engineering for all of Google security came from</p> <p>19 the financial services organization, but also</p> <p>20 possesses a super deep engineering expertise in</p> <p>21 security and he is often called upon today to</p> <p>22 represent Google in high-stakes moments externally</p> <p>23 where a knowledge of engineering, large-scale</p> <p>24 engineering management, large scale engineering --</p> <p>25</p>